

# EXHIBIT B

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*Proposed Co-Lead Counsel for Movant and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

BRIAN H. ROBB, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

FITBIT INC., JAMES PARK, and WILLIAM  
R. ZERELLA,

Defendants.

) Case No. 3:16-cv-00151-SI  
)  
) **SUPPLEMENTAL DECLARATION OF**  
) **TIMOTHY FLYNN IN SUPPORT OF**  
) **FITBIT INVESTOR GROUP'S MOTION**  
) **FOR APPOINTMENT OF LEAD**  
) **PLAINTIFF AND APPROVAL OF**  
) **COUNSEL**  
) **CLASS ACTION**  
)  
)  
)  
)  
)  
)

1 I, Timothy Flynn, pursuant to 28 U.S.C. §1746, declare as follows:

2 1. I respectfully submit this supplemental declaration in further support of the Fitbit  
3 Investor Group's motion for appointment as Lead Plaintiff pursuant to the Private Securities Litigation  
4 Reform Act of 1995 ("PSLRA"), and for approval of our selection of Glancy Prongay & Murray LLP  
5 and Pomerantz LLP to serve as Co-Lead Counsel. I have personal knowledge of the matters set forth  
6 herein as it relates to me, and are offered in accordance with the Court's Order to File Supplemental  
7 Declarations on April 15, 2016.

8 2. I, Timothy Flynn, live in St. Louis, Missouri.

9 3. I have a Bachelor of Arts Degree in political theory from Georgetown University.

10 4. I am a web developer and run a personality test website.

11 5. I have been investing in the securities markets for around ten years. Generally, I engage  
12 in long-term investing with a focus on high growth technology companies. Due to my prior experience  
13 and substantial losses of more than one million dollars stemming from my investments in Fitbit  
14 securities, I am substantially motivated and believe that I can adequately represent the interests of the  
15 class.

16 6. Because of the magnitude of my losses from investing in Fitbit during the class period,  
17 upon learning about the initiation of this Action, I reached out to proposed Co-Lead Counsel to  
18 discuss my rights and options related to this litigation. After multiple communications, I expressed my  
19 interest to serve as lead plaintiff, either individually or as part of a group of investors, in this matter to  
20 proposed Co-Lead Counsel. Through proposed Co-Lead Counsel, I was introduced to other similarly  
21 situated investors with losses in Fitbit similar to my own. At the time of the filing of our motion, I was  
22 aware of and agreed to move as part of the lead plaintiff group. I am confident that, having spoken and  
23 interacted with the other members of the Fitbit Investor Group, that we will be able to function  
24 cohesively and effectively oversee proposed Co-Lead Counsel and this litigation.

25 I declare under penalty of perjury under the laws of the United States of America that the  
26 foregoing is true and correct to the best of my knowledge.  
27  
28

Executed this 20<sup>th</sup> day of April, 2016 in St. Louis, Missouri.

  
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Timothy Flynn